

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL CACOPERDO,

Plaintiff,

- against -

HARTFORD LIFE INSURANCE
COMPANY,

Defendant.

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: 10 CV 7847 (RPP)

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: ECF


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: **NOTICE OF MOTION**

PLEASE TAKE NOTICE that upon the Declaration of Jason Newfield, dated June 1, 2012, and the exhibits annexed thereto, Plaintiff Rule 56.1 Statement; Plaintiff's Memorandum of Law submitted simultaneously herewith; and all papers and proceedings herein, Plaintiff Michael Cacoperdo respectfully files this motion, and will move this Court, on a date and at a time set by the Court, before the Hon. Robert P. Patterson, at the United States District Courthouse for the Southern District of New York, for an order pursuant to Rule 56, granting summary judgment, upon the ground that there is no genuine issue of material fact to be tried, and Plaintiff is entitled to judgment as a matter of law and for such other and further relief as this Court deems just and proper.

Dated: Garden City, New York
June 1, 2012

Respectfully submitted,

FRANKEL & NEWFIELD, P.C.



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